

## **REMARKS/ARGUMENTS**

Applicants thank Examiner Prieto for the 23 May 2006 Interview. As the Examiner noted in the 23 May 2006 Examiner's Interview Summary, Mr. Sturniolo demonstrated during the interview how as a mobile device changes its network point of attachment, its network identifier (and potentially also, the network identifier of the peer) changes accordingly. Mr. Sturniolo explained that in many prior systems involving disjoint networks, such a change in network identifier causes communications between the network devices to terminate. Communications must then be reestablished using a new network identifier. This can be a problem in contexts such as police, fire and other communications situations where it is important to maintain continuous communications.

Mr. Sturniolo explained that the exemplary illustrative non-limiting technology disclosed in the subject patent application allows for communications to continue across disjoint networks even when network identifiers change. See for example Figures 21-23 in conjunction with the description in applicants' patent specification beginning at page 104 line 28 ("Roaming Across Disjoint Networks") (emphasis added):

A further aspect ... provides an algorithm and arrangement for accessing the MMS (Mobility Management Server) in what we call "disjoint networking" mode. The new algorithm allows for dynamic/static discovery of alternate network addresses that can be used to establish/continue communications with an MMS -- even in a disjoint network topology in which one network may have no knowledge of network addresses for another network.

In general, the algorithm allows for a list of alternate addresses that the MMS is available at to be forwarded to an MES (Mobile End System) during the course of a conversation. Thus, the MMS uses a connection over one

network to send the MES one or more MMS network addresses or other MMS identities corresponding to other networks..... If/when the MES roams to a second network, it uses the list of MMS "alias" addresses/identifications to contact the MMS over the new network connection on the second network. This allows the MES to re-establish contact with the MMS over the new network connection even though the first and second networks may not share any address or other information....

Mr. Sturniolo explained that such technology in combination with other features described in the subject patent application can allow computer applications to continue to communicate even when roaming across disjoint networks.

As the Examiner suggested, applicants have amended their claims to more particularly point out their claimed subject matter. Specifically, applicants have amended claim 21 to require, in combination, "thereby allowing communications between the first and second computing devices to continue even though said network identifier changes." A similar limitation has been added to independent claim 38. Independent claims 26 and 43 have been amended to more clearly recite policy and/or authentication aspects in conjunction with network identifier changes across disjoint networks.

As the Examiner correctly noted in the Examiner's Interview Summary Record, Mr. Sturniolo explained during the interview that the applied Perkins reference does not teach or suggest such features, and in fact solves a different problem. Perkins' approach assumes that the communicating peers retain unique network addresses for the duration of the communication, and he uses packet forwarding/routing to ensure packets get to their proper destinations. See for example the preamble to claim 1 of the Perkins reference:

1. A method for routing a packet of information between two mobile hosts that are coupled to an ad-hoc network comprised of a plurality of mobile hosts, each of the mobile hosts having a unique network address but not having a fixed location, said ad-hoc network conforming to a network standard including a network-layer and a link-layer...  
(emphasis added).

Thus, Perkins does not teach or suggest, in combination, allowing communications to be maintained even though at least one of the network identifiers changes as claimed herein. Neither Moore nor Schlesinger supplies the missing teachings.

Applicants request the USPTO to reconsider and allow this case in view of the amendments and remarks. Should only minor issues remain outstanding, the Examiner should contact the undersigned at the telephone number listed below so they can be resolved expeditiously without need of a further written action.

Respectfully submitted,

**NIXON & VANDERHYE P.C.**

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